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July 16, 2021

Via ECF
The Honorable Valerie Caproni, U.S.D.J.
United States District Court for Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 100007

> **Re: The Roman Catholic Diocese of Rockville Centre, New York v.**
> **Arrowood Indemnity Company**
> **USDC, SDNY Case No.: 20-CV-11011(VEC)**
> **Our File No.: R0078-00181**

Dear Judge Caproni,

We represent defendant Arrowood Indemnity Company in the above-referenced matter. We write to request an extension of time to file our reply brief with regard to the Motion for Leave to Amend our Answer and file a Counterclaim (ECF 65-67). Our reply brief with regard to that motion is due to be filed today, July 16, 2021. We request an extension until July 23, 2021. Plaintiff has consented to this extension. This extension is requested as a result of vacation schedules as well as the issues raised by the Plaintiff in its opposition to motion for leave.

In addition, we seek relief from the ten (10) page limit on reply briefs and request leave to file an over-length brief. Plaintiff's submission raises futility as a defense to Arrowood's motion with regard to almost every cause of action raised in the proposed Counterclaim. Given the number of causes of action and our need to address each with regard to the futility argument, the submission may exceed the ten (10) page limitation. We will endeavor to as concise as possible but request leave to file an over length brief. Plaintiff has also consented to this request.

We appreciate the Court's consideration. Should Your Honor have any questions, please do not hesitate to contact us.

Respectfully yours,

COUGHLIN MIDLIGE & GARLAND LLP

/s/ Adam M. Smith

Adam M. Smith

cc: All counsel via ECF